

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814
May 6, 1987



ALL-COUNTY LETTER NO. 87-67

To: ALL COUNTY WELFARE DIRECTORS

SUBJECT: FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

The purpose of this letter is to provide counties with currently available information about the statewide implementation of the federally required Food Stamp Employment and Training (FS E&T) program. It will be necessary for each county to develop and submit a plan of operation for the program by June 5, 1987. The county plans will be compiled into a state plan that must be approved by the Food and Nutrition Service (FNS). Attached are the FS E&T Planning Guidelines (Attachment I) which contain detailed descriptions of the FS E&T program requirements and plan formats.

Background

The Food Security Act of 1985 (Public Law 99-198) made extensive changes to the work requirements of the Food Stamp Program. States are now required to engage certain nonassistance food stamp recipients in employment and training activities. States may determine the categories of persons to be served and design program components which meet the federal participation requirements. Prior to the law change, the Food Stamp Job Search (FSJS) program was an option available to each State and in California was operated in selected counties.

The 1985 law change requires that each State implement no later than April 1, 1987 an FS E&T program which has been approved by the FNS. However, final regulations published by FNS on December 31, 1986, allow interim implementation from April 1 through September 30, 1987. In order to provide more time to counties for the statewide implementation, the State Department of Social Services (SDSS) submitted an interim implementation plan involving only those counties that wished to continue FSJS and were willing to make the necessary program and statistical reporting changes.

Initially the interim plan was not approved by FNS. Two reasons were cited: (1) failure to provide participant reimbursement during the April 1, 1987 through June 30, 1987 period, and (2) inadequate justification for exempting most of California from implementation of FS E&T. FNS allowed one month's funding for the counties in the interim implementation plan and required submittal of a revised plan in thirty days. FNS also gave advance notice of the proposed disallowance of ten percent of the federal share of the quarterly certification activity administration funds. We have taken steps to provide for the participant reimbursement and have provided additional justification for our plan to limit the April through September 1987 implementation to the current FSJS counties, thereby resolving FNS concerns.

Statewide Implementation

We have conferred with a special county task force established by the County Welfare Director's Association (CWDA) on issues involving design of California's FS E&T program. Based on feedback from that task force, we have decided to allow counties to design FS E&T programs which best fit local needs within the parameters of the federal requirements. However, we strongly encourage counties to provide job search services to applicants. Such a requirement is an effective way to encourage applicants to work and avoid long-term dependency. Additionally, federal performance standards include an incentive for the provision of services to applicants. For these reasons, counties must provide strong justification to obtain approval of plans that do not include job search services for applicants.

Consistent with federal regulations, it may be appropriate to exclude certain counties from the program. If a county wishes to be exempt from the operation of an FS E&T program, justification regarding the impracticality of operating a program must be provided in the county plan. Factors that could contribute to a finding of impracticality include a depressed economy and long travel distances in sparsely populated areas. The lack of funds or conflict with the county GAIN plan will not be viewed by FNS as acceptable reasons for impracticality.

Although the federal deadline for submitting state plans is August 15, 1987, we plan to submit an FFY 1987-88 plan to FNS by the end of June 1987. It is hoped that early approval from FNS can be obtained, thereby improving our ability to meet the required implementation deadline of October 1, 1987.

Mandatory Participants

Individuals who must participate in the FS E&T program include those Food Stamp applicants and recipients not exempt from work registration (see MPP Section 63-407.2) and those work registrants not deferred from participation.

A work registrant may be deferred for a variety of reasons which include, but are not limited to, lack of child care or transportation, unreasonable distance from the FS E&T program site, family or legal difficulties, temporary unemployment, and physical or mental problems not discovered prior to registration. Work registrants also may be deferred from FS E&T participation if they are participating in another program which has requirements that exceed those for FS E&T.

Mandatory participants who fail to participate without good cause are subject to a two-month Food Stamp disqualification. Participants must be reimbursed for transportation, child care, or other costs that are reasonably necessary and directly related to participation up to \$25.00 per month.

Funding for the FS E&T Program

FNS provides a 100 percent federal allocation for the administrative cost of the program. Allocations are based on each state's percentage of the nationwide caseload. California's share is eight percent. Estimates of California's allocations, based on the eight percent figure, along with nationwide funding follow:

Federal Fiscal Year	Nation	California
FFY 1986-87	\$50,000,000	\$3,800,000
FFY 1987-88	60,000,000	4,800,000
FFY 1988-89	75,000,000	6,000,000
FFY 1989-90	75,000,000	6,000,000

If a State wants to provide services at a level which exceeds the 100 percent allocation, additional funding may be available at the 50 percent federal financial participation (FFP) level. Since the 100 percent funding level may not be sufficient in some counties to provide their desired level of service, SDSS is pursuing inclusion of additional funds at 50 percent FFP in the state budget. This will allow counties to offer additional services with the additional costs being shared at the normal 50 percent federal/25 percent state/25 percent county ratio.

Counties may request approval from SDSS to operate a program which has costs in excess of the 100 percent federal allocation. To the extent that proposed services are consistent with federal requirements and that required funding is within the budgeted amount, requests will be forwarded to FNS for approval as part of the state plan.

Attachment II contains preliminary county allocations for the period of October 1, 1987 through June 30, 1988 which have been developed for county planning purposes. This allocation represents each county's proportionate share of the 100 percent federal allocation. The allocation was based upon the percent of nonassistance Food Stamp recipients in each county compared to the statewide total. In the event that some counties become geographically exempt, their allocations will be redistributed to counties that are not geographically exempt.

The FFP rate for the mandated \$25 participant reimbursement is 50 percent. Because this is a federal mandate, counties will be reimbursed for the \$25 per participant per month costs at the usual 50 percent federal/25 percent state/25 percent county ratio.

Federal Performance Standards

FNS will impose performance standards beginning with the October 1988 to December 1988 period. The Secretary of Agriculture has established performance standards for states based on a percentage of those expected to participate (denominator) who either participate or are sanctioned for nonparticipation (numerator). Favorable treatment in achieving the performance standard is provided to states (and counties) that serve

applicants. All applicants who participate or are sanctioned are counted in the numerator but only those who later become certified are counted in the denominator.

The percentages have been specified as follows:

-	October 1988 - December 1988	35 percent
-	January 1989 - September 1989	35 percent
-	FFY 1989 - 1990	50 percent

Fiscal sanctions may be imposed by FNS to the degree that the performance standard is not met. Along with the flexibility to design their FS E&T programs, counties also have the responsibility to meet the performance standards. Where counties fail to meet the performance standard and FNS imposes fiscal sanctions, they will be expected to share in the fiscal sanction. The specific methodology for determining the state and county share in any fiscal sanction will be determined at a later date. We will conduct detailed discussions with CWDA in the near future relating to this methodology.

Federal determination of whether or not a state has met the performance standard will be largely based on the required quarterly statistical reports. These reports include data on the number of work registrants, notices of adverse action, reasons for exemptions, and placement of individuals in components.

PROGRAM OPERATIONS

As indicated above, each CWD has the flexibility to choose the type of FS E&T component(s) it will operate. Components include job club, job search, workfare and work experience. The CWD may operate the program or contract with another organization to operate the program.

Counties that operate their own programs may establish independent FS E&T components and/or use existing components of other work programs in General Assistance, the Refugee Employment Services Program or GAIN. If existing components are used, the following conditions must be met.

- o Participation and sanction requirements are consistent with FS E&T.
- o The components are described in an approved county plan.
- o Activities associated with the delivery of services to FS E&T participants are time-studied and claimed to the FS E&T program. Claiming instructions for the Quarterly Administrative Expense Claim which affect the FS E&T program will be provided in a separate letter by the SDSS Fiscal Policy and Procedures Bureau (FPPB).

CWD staff are encouraged to contact three of the counties currently operating FS E&T for information useful in the planning process. Counties which may be contacted are Fresno, San Diego, and Santa Clara.

Electronic Data Processing (EDP) Systems

Counties planning to operate an FS E&T program may need to develop or modify a current EDP system. The State has been given an allocation for the interim period of April 1, 1987 through September 30, 1987 which FNS has indicated can be used to cover such costs. Subject to FNS approval, there may be 100 percent federal funding available to the State for the development and purchase of EDP systems. For planning purposes we are asking that counties who anticipate incurring such expenses include that amount in their county plans. We plan to submit an amendment to the interim implementation plan formally requesting approval to utilize the 100 percent funding for this purpose.

To receive approval on the actual system modifications proposed, procedures governing prior notification/approval contained in Division 28 must be followed. In addition, requests should be made to the SDSS County Approvals Section. Development and/or modification proposals exceeding \$200,000 will require prior FNS approval. Further instruction on county approvals for FS E&T EDP systems will be issued under separate cover.

County Plan Submittal

Attachment I contains the format for completing county plans. Counties desiring geographical exclusion in total need only complete Part 5 of the county plan.

Please send your FS E&T plan and/or request for geographical exclusion by June 5, 1987 to the Employment Services Bureau, 744 P Street, M.S. 12-38, Sacramento, CA 95814.

If you have any questions, please have your staff contact the Employment Services Bureau at (916) 323-5206.



LINDA S. McMAHON
Director

Attachments

cc: CWDA

ATTACHMENT I

FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM PLANNING GUIDELINES

- A. Definitions
- B. Program Requirements
- C. County Plan Format Outline
- D. County Plan Format
- E. Reporting Form

A. DEFINITIONS

Alternate program delivery: The delivery of FS E&T services through existing programs such as General Assistance, Refugee Employment Services Program or GAIN.

Base of eligibles: FS E&T mandatory participants (defined below) plus persons who volunteer for FS E&T participation. This base may be reduced by 10 percent if participants served include individuals who leave the program within 30 days of application.

Certified: An individual who is approved to receive food stamps.

Component: A job club/job search, work or training assignment designed to help food stamp participants to move promptly into unsubsidized employment.

Deferred registrant: A work registered individual whose circumstances prevent him/her from participating in FS E&T activities. Work registrants who are participating in programs that have standards exceeding those for FS E&T also may be deferred.

Employment and training grant: 100 percent federal funding to cover the administrative and program costs involved in operating FS E&T. This does not cover participant reimbursement.

Employment and training program: A program operated by a county consisting of one or more FS E&T components.

Geographic exclusion: A county or part of a county that, due to compelling reasons, is approved by FNS to be geographically excluded.

Individual deferral criteria: Criteria for deferring an individual for personal reasons, such as lack of child care, transportation, mental problems, etc.

Mandatory participant: A work registrant who is not deferred from participation.

Matched funding: Funding at the 50 percent FFP level of program costs in excess of the 100 percent allocation. If the expenditures are approved, they will be reimbursed at the 50 percent federal/50 percent non federal (25 percent county, 25 percent state) rate.

Participant reimbursement funding: The 50 percent federal/25 percent state/25 percent county funding for the costs of participation, such as transportation and child care.

Placement: A "placement" occurs when a work registrant commences a component or is sent a Notice of Adverse Action (NOAA) for noncompliance or is denied certification due to noncompliance with a FS E&T program requirement. Persons who refuse to work register or who voluntarily quit a job and are sent a NOAA may not be considered "placed".

Substitute program: A program that has participation requirements which exceed those contained in the FS E&T program.

Work registrant: An individual who is required to register for work pursuant to MPP 63-407.1.

B. PROGRAM REQUIREMENTS

COMPONENTS

Following is a description of the categories of components and the participation requirements the federal regulations allow states to establish. The number of months and number of successive components in which participation is required may be determined by the county as long as the minimum and maximum participation requirements of the program are met.

Requirements may vary among participants. The maximum hours of participation imposed on each individual must not exceed 120 hours per month, including non-work and work component hours, Food Stamp Workfare program hours, and hours worked for compensation, in cash or in kind. Both applicants and recipients of Food Stamps may be required to participate in the various components.

JOB CLUB/JOB SEARCH:

- o Job club (job search workshop) consists of group training sessions in job finding skills, job interviewing skills, understanding employer requirements and expectations, and in enhancing self-esteem, self-image, and confidence.
- o Supervised job search consists of an organized method of seeking work and may include access to phone banks, job orders, and direct referrals to employers.
- o Unsupervised job search consists of independent efforts by a registrant to look for employment and follow-up interviews by professional staff to determine the adequacy of the job search.

Participation requirements:

The minimum participation requirement in job club/job search components is 12 hours a month for two months or an equivalent effort. Participation requirements cannot be imposed if they would delay the determination of eligibility for or issuance of benefits to any household otherwise eligible. In job search, the participation requirement may begin at application for an initial period of up to eight consecutive weeks and continue for an additional period of up to eight weeks during 12 consecutive months. The 12-consecutive-month period may begin at any time following the close of the initial eight consecutive week period imposed on an applicant. An example of the time frames involved in applicant versus recipient job search follows:

Application/ Assignment to applicant job search(JS)	Certified eligible	End of 8 week applicant JS	Assigned 8 week recipient JS	Leaves Food Stamp program	Reapplies
10/1/87	10/16/87	11/25/87	1/4/88	1/31/88	2/26/88

An individual applies for Food Stamps and is assigned to an eight week period of job search on October 1, 1987. On October 16, 1987 the individual is certified eligible for Food Stamps and continues the job search assigned at application until completion on November 25, 1987. On January 4, 1988 the individual is assigned to an eight week period of recipient job search and the 12 consecutive month period begins. The assigned individual leaves the Food Stamp program, after completing only four of the eight weeks of recipient job search. At reapplication for Food Stamps, the individual can be assigned to eight weeks of job search again, because the 12-month period was broken by a period in which no Food Stamps were received.

WORK COMPONENTS:

- o Workfare consists of a nonsalaried assignment with a public or private nonprofit agency that provides the registrant opportunity to develop basic work habits or to practice existing skills. Individuals assigned to workfare must be provided the same benefits and working conditions provided to employees performing comparable work for comparable hours. In addition, a workfare assignment cannot result in the displacement of employed individuals or in the reduction of employment opportunities, such as substituting a workfare person in a vacant position.
- o OJT/Work Experience consists of an assignment to provide work experience or training or both to enable participants to move promptly into regular public or private employment. The assignment is limited to projects that serve a useful public purpose in fields such as health, social services, environmental protection, etc. The assignment can not replace a regular employee but must provide the same benefits and working conditions that are provided to regular employees.

Participation requirements:

There are maximum participation limits for both households and individuals. Work component participation requirements imposed collectively on members of a household each month are limited to the number of hours equal to the household's allotment for that month divided by the higher of the applicable State or Federal minimum wage. The limits for individuals are specified above under COMPONENTS.

TRAINING:

Vocational training which consists of a project, program or experiment, such as a supported work program or a JTPA or state or local program aimed at accomplishing the purpose of the FS E&T.

There are no specific participation requirements, as long as the FS E&T minimum and maximum participation requirements are met.

ALTERNATE SERVICE DELIVERY METHODS:

Each CWD has the flexibility to choose the type of FS E&T component(s) it will operate. The CWD may operate the program or contract with another organization to operate the program.

Counties that operate their own programs may establish independent FS E&T components and/or use existing components of other work programs in General Assistance, the Refugee Employment Services Program or GAIN. If existing components are used, the following conditions must be met.

- o Participation and sanction requirements are consistent with FS E&T.
- o The components are described in an approved county plan.
- o Activities associated with the delivery of services to FS E&T participants are time-studied and claimed to the FS E&T Program in accordance with applicable time study and claiming instructions issued by Fiscal Policy and Procedures Bureau (FPPB).

CWD staff are encouraged to contact the counties operating FS E&T for information useful in the planning process. Those counties are Fresno, San Diego, and Santa Clara.

PARTICIPANT REIMBURSEMENT:

Participants must be reimbursed for transportation, child care, or other costs that are reasonably necessary and directly related to participation up to \$25.00 per month. Because this is a Federal mandate, counties will be reimbursed for the participant reimbursement costs at the usual 50 percent Federal/ 25 percent State/ 25 percent County ratio. Counties have the option to pay in advance or in arrears; to use vouchers, checks, or cash; and to require participant verification of actual costs or to assume an average cost of \$25 per month.

MANDATORY PARTICIPANTS:

Food Stamp applicants and recipients are mandatory participants unless exempt from work registration or deferred from participation. Individuals are exempt from work registration if they meet the specifications in MPP Section 63-407.2(a) through (h).

Federal regulations allow States to defer from participation those individuals who: (1) have participated in the Food Stamp program for 30 days or less, (2) cannot participate due to personal circumstances, (3) participate in a program with standards exceeding those of the FS E&T program, and (4) reside in an area approved by FNS to be geographically excluded.

While counties have the option to defer the short-term Food Stamp participants mentioned in (1) above, we strongly encourage serving these individuals at the time of application. Research findings from the Work Registration and Job Search Demonstration Project indicate that work programs provided close to the beginning of Food Stamp program participation show attractive cost-benefit relationships. In addition, it is easier to meet performance standards if short-term individuals, particularly applicants, are served. See the PERFORMANCE STANDARDS section below for details.

Individuals mentioned in (2) above may be deferred from FS E&T participation for a variety of reasons which include, but are not limited to, lack of child care or transportation, unreasonable distance from the FS E&T program site, family or legal difficulties, temporary unemployment, and physical or mental problems not discovered prior to registration. Reasons for deferrals will be included in the State FS E&T plan and must receive FNS approval prior to being used.

Individuals mentioned in (3) above may be deferred from FS E&T participation if they participate in programs with requirements that exceed those of the FS E&T program. For example, individuals placed in a county General Assistance work program that requires participation of more than 120 hours per month would be deferred from FS E&T.

The state may propose to exclude certain geographic areas from the operation of a FS E&T program. In order to obtain FNS approval of such an exclusion, justification regarding the impracticality of operating a program in that area must be provided by the county for inclusion in the state plan.

A county or part of a county may be geographically excluded. FNS has suggested some factors which might help justify a geographic exclusion. These include lack of job opportunities, the remote location of job opportunities, and lack of child care facilities. Other factors which might be considered by FNS include: no public transportation in the area; recent plant closures causing high unemployment; and, officially declared disaster areas. Lack of funds or conflict with Greater Avenues for Independence (GAIN) are not acceptable reasons for impracticality.

Counties who desire total exclusion must provide strong justification and rationale.

PERFORMANCE STANDARDS:

Performance standards for States are set by the Secretary of Agriculture and have been specified as follows:

- October - December 1988	35 percent
- January - September 1989	35 percent
- FFY 1989-90	50 percent

The performance standard formula involves dividing the number of "placements" by the "base of eligibles". A "placement" occurs when a mandatory or volunteer individual begins an assignment and when a mandatory individual's Food Stamp eligibility is denied or terminated due a to failure to comply.

The "base of eligibles" includes all mandatory participants in the month of October added to each month's new mandatory participants and recipient volunteers who are placed in a component. The mandatory participants include all FS work registrants who are not deferred from participation in the month of October plus each of the eleven subsequent months' newly work registered non-deferred individuals. Note that only those volunteers who are placed are counted in the base of eligibles.

Following is the performance standard formula:

$$\frac{\text{Placements into components} + \text{NOAA's for noncompliance}}{\text{Mandatory participants} + \text{volunteers who enter a component}}$$

There are special rules for counting placements and computing the above formula when short-term individuals are not deferred from participation. (Short-term individuals include applicants as well as recipients who receive no more than one month's allotment.) In this case the base of eligibles can be reduced by 10 percent without supporting documentation. If an actual count

of persons who leave the program in 30 days or less is maintained, that number can be subtracted from the base, instead of the standard 10 percent.

Requiring participation at application, rather than at certification, results in an additional advantage. Applicants are not counted in the base, until certified for Food Stamp benefits. In other words, only certified, work-registered, non-deferred individuals are counted in the base. For example, if an applicant complies with a FS E&T assignment and is denied eligibility or withdraws from eligibility determination, that individual is counted as a placement but is not counted in the base.

The following example illustrates the effects of the above two provisions:

Mary S. applies for NAFS on October 2, 1987 and as an applicant she begins Job Search on October 3, (tally 1 for placement). On November 3, 1987 she becomes Food Stamp certified (tally 1 for the base). On November 5, she begins Job Club (tally 1 for placement). In November she fails to participate in Job Search activities and is sent a Notice of Adverse Action for noncompliance (tally 1 for placement). When calculating the performance standard, 10 percent can be deducted from the base at the end of the year. Consequently, Mary would contribute the following to the performance standard:

$$\frac{3 \text{ placements}}{1 - (1 \times .1)} = \frac{3}{.9} = 333\%$$

STATISTICAL REPORTING:

Federal regulations require that quarterly statistical reports be submitted 45 days after the close of the quarter. SDSS is requiring that counties submit the report within 15 days of the close of the quarter to allow time to compile the county reports and meet the Federal deadline. Section E is a preliminary statistical reporting form for counties to use.

There are two items that might require special tracking procedures. Counties must track the number of mandatory registrants in October, both newly non-deferred work registered in that month and non-deferred work registrants on hand from the previous federal fiscal year. Also, it is important to report each non-deferred work registered individual only once in the federal fiscal year. If a newly non-deferred work registered individual is reported more than once in the year, the base of eligibles is inflated, making the performance standard more difficult to reach.

C. OUTLINE OF FORMAT REQUIRED FOR FS E&T COUNTY PLANS

PART 1: SUMMARY OF COUNTY FOOD STAMP EMPLOYMENT AND TRAINING PROGRAM

1.1 Abstract of the Plan for the County E&T Program

1.1.1 Program Name

1.1.2 Program Components

1.1.3 Program Consistency

1.1.4 Program Coverage

1.1.5 Other Features

1.2 Program Components

1.2.1 E&T Component Locations

1.2.2 Component Descriptions

PART 2: PROGRAM PARTICIPATION AND DEFERRALS

2.1 Work Registrant Population

2.2 Geographic Exclusion Criteria

2.2.1 Geographic Exclusion Criteria Justification

2.3 Deferral Criteria

2.3.1 Individual Deferral Criteria and Justification

2.3.2 Substitute Program Deferral Justification

2.4 Number of Deferred Registrants

2.5 Planned E&T Program Participants

PART 3: PROGRAM COORDINATION

3.1 Intra-agency Coordination

3.1.1 Narrative Coordination Statement

3.1.1.1 Information Coordination

3.1.1.2 Coordination Timeframes

3.2 Inter-agency Coordination

3.2.1 Areas of Coordination

3.2.2 Coordinating Agencies or Programs

3.2.3 Methods of Coordination

PART 4: PROGRAM COSTS AND FINANCIAL MANAGEMENT

4.1 Planned Costs of the County E&T Program

4.1.2 Component Costs

4.1.3 Justification of Certain Costs

4.1.3.1 Justification of Costs Exceeding the E&T Grant

4.2 Contractual Arrangements

4.3 Participant Reimbursement

PART 5: TOTAL COUNTY GEOGRAPHIC EXCLUSION

5.1 Work Registrant Population

5.2 Exclusion Justification

D. FOOD STAMP EMPLOYMENT AND TRAINING COUNTY PLANNING FORMAT

Part 1: PROGRAM COMPONENTS

The County Welfare Department (CWD) should provide a summary of the Employment and Training Program (E&T) that the CWD plans to implement.

1.1 Abstract of the CWD FS E&T Program

1.1.1 Program Name. If the F&T program will have a specific program name, or if it will be part of a more comprehensive work program, the name of that program should be given.

1.1.2 Program Components. Provide a list of components that will be included in the F&T program.

1.1.3 Program Consistency. Describe whether the program will be consistent in all local areas included in the F&T program.

1.1.4 Program Coverage. Specify the percentage of all work registrants in the CWD who are expected to participate in any F&T component.

1.1.5 Other Features. Any other features of the county's program that the CWD considers significant should be summarized in this section.

1.2 Program Components

This part of the County Plan should provide detail on each of the components the CWD chooses to include in the F&T program.

1.2.1 F&T Component Locations. This section should include a map that specifies where in the county training components will operate during the year. Specific cities/towns, local agencies, districts, Indian Reservations, or any other relevant operational designation should be noted. If different components will operate in different locales, those variations should also be specified. If areas of the county are being geographically excluded (see Section 2.2), indicate on the map.

1.2.2 Component Descriptions. Detail shall be provided in the following sub-sections on what each component will include, and how different services will be delivered.

1.2.2.1 Unsupervised Job Search

- o Name of the component.
- o Number of job contacts that will be required over what time period.
- o Types of participants.
 - Number of applicants served.
 - Number of recipients served.

- o Level of participant effort and the estimated number of hours of participation required.
- o Organizational responsibilities.
- o Method for monitoring job contacts.
- o Geographic areas covered by the component.
- o Variations among local areas.
- o Percent of the county's total work registrants who are expected to be served by this component, and the number expected in the component.

1.2.2.2 Supervised Job Search

- o Name of the component.
- o Number of job contacts.
- o Types of participants.
 - Number of applicants served.
 - Number of recipients served.
- o Use of phone banks, job orders and referrals to employers.
- o Level of participant effort and the estimated number of hours of participation required.
- o Organizational responsibilities.
- o Geographic areas covered by the component.
- o Variations among local areas.
- o Percent of the county's total work registrants who are expected to be served by this component, and the number expected in the component.

1.2.2.3 Job Search Workshops

- o Name of the component.
- o Duration.
- o Types of participants.
 - Number of applicants served.

- Number of recipients served.
- o level of participant effort and the estimated number of hours of participation required.
- o Organizational responsibilities.
- o Geographic areas covered by the component.
- o Variations among local areas.
- o Percent of the county's total work registrants who are expected to be served by this component and the number expected in the component.

1.2.2.4 Workfare

- o Name of the component.
- o Method of recruiting work site sponsors.
- o Number of work site positions expected.
- o Types of participants.
 - Number of applicants served.
 - Number of recipients served.
- o level of participant effort and the estimated number of hours of participation required.
- o Organizational responsibilities.
- o Method for monitoring.
- o Geographic areas covered by the component.
- o Variations among local areas.
- o Percent of the county's total work registrants who are expected to be covered by this component and the number expected in the component.

1.2.2.5 OJT/Work Experience

- o Name of the component.
- o Type of OJT or work experience.
- o Duration.

- o Types of participants.
 - Number of applicants served.
 - Number of recipients served.
- o Level of participant effort and the estimated number of hours of participation required.
- o Organizational responsibilities.
- o Geographic areas covered by the component.
- o Variations among local areas.
- o Percent of the county's total work registrants who are expected to be served by this component and the number expected in the component.

1.2.2.6 Vocational Training

- o Name of the component.
- o Type of training program (e.g., JTPA, State Supported Work Program, Vocational Centers).
- o Duration (e.g., one to three month courses, 6-8 hours per day).
- o Types of participants.
 - Number of applicants served.
 - Number of recipients served.
- o Level of participant effort and the estimated number of hours of participation required.
- o Organizational responsibilities.
- o Geographic areas covered by the component.
- o Variations among local areas.
- o Percent of the county's total work registrants who are expected to be served by this component and the number expected in the component.

1.2.2.7 Other Components

- o Name of the component.

- o Services.
- o Duration.
- o Types of participants.
 - Number of applicants served.
 - Number of recipients served.
- o Level of participant effort and the estimated number of hours of participation required.
- o Organizational responsibilities.
- o Geographic areas covered by the component.
- o Variations among local areas.
- o Percent of the county's total work registrants who are expected to be served by this component and the number expected in the component.

PART 2:
PROGRAM PARTICIPATION AND DEFERRALS

This section includes the number of total work registrants, the number of work registrants residing in geographically excluded areas, and the number who will be deferred for other reasons.

2.1 Work Registrant Population

A critical part of the planning process is a careful analysis of the characteristics of the work registrant population and the potential E&T caseload. This type of analysis is essential for determining the scale of program that is anticipated, as well as for deciding what types of services/components to provide. In addition, these data could be used to justify deferral criteria.

If such analysis has been done, a summary of the characteristics of the work registrant population should be included in this section of the Plan. The data should reflect the type of analysis undertaken to decide on the E&T program chosen by the county. For example:

- o Number of work registrants for recent fiscal years
- o Demographic characteristics of work registrants (e.g., age, household status, sex, special groups such as Indians, migrant workers, refugees)
- o Program status (PAFS versus NAFS; AFDC status; 6A status)

The summary should note how the data were compiled (e.g., special survey, FS Job Search Program data, analysis of the Quality Control file, CWD automated client record or certification system).

2.2 Geographic Exclusion Criteria

Part(s) of a county may be geographically excluded. FNS has suggested that factors which might justify a geographic exclusion include lack of job opportunities, the remote location of job opportunities, and lack of child care facilities. Other factors which might be considered by FNS include lack of public transportation in the area, recent plant closures causing high unemployment and areas declared disaster areas.

Lack of funds or conflict with GAIN are not acceptable reasons for impracticality.

2.2.1 Geographic Exclusion Justification.

Justification and documentation for the exclusion proposed must be included in this section of the Plan. If appropriate, provide economic evidence.

2.3 Deferral Criteria

There are three types of deferral criteria: 1) individual, 2) substitute programs, and 3) geographical area exclusion.

Individual deferral criteria includes lack of child care or transportation, unreasonable distance from the E&T program site, family or legal difficulties, temporary unemployment and physical or mental problems not discovered prior to registration.

Substitute program deferral applies to work registrants who are participating in a program that has participation requirements which exceed those in the FS E&T program.

2.3.1 Individual Deferral Criteria and Justification. List each criterion to be used and detail the following:

- 2.3.1.1 Explanation as to why such personal characteristics or situations would justify deferring an individual otherwise required to participate in the E&T program.
- 2.3.1.2 The types of evidence that will be used to determine whether a deferral should be authorized. A full explanation should be provided.
- 2.3.1.3 Individuals who will have authority to grant individual deferrals (e.g., eligibility worker, E&T staff, E&T supervisor).
- 2.3.1.4 Frequency with which an individual's deferral status will be reevaluated.

2.3.2 Substitute Program Deferral Justification. Describe the types of programs which will be utilized as substitutes for participation in FS E&T. Provide the estimated number of registrants deferred due to participation in such programs.

2.4 Number of Work Registrants Deferred from the E&T Program.

This section of the Plan must indicate what percentage of the county's total number of work registrants are expected to be included in the geographical exclusion and individual or substitute program deferrals planned. The format in Table 1 should be used.

Table 1

Planned Number of Work Registrants Deferred
from E&T Participation

-
1. Total Work Registrants
in the County During the Year
 2. Number of Work Registrants Residing in Areas
Geographically Excluded from F&T
 3. Number of Work Registrants
Individually Deferred from F&T
 4. Number of Work Registrants Deferred Due
to Participation in Substitute Programs
 5. Total Number of Work Registrants
Deferred from F&T

Percent of all work registrants
deferred from F&T

2.5 Planned E&T Program Participants

In this section of the Plan, Counties should provide a summary of the F&T caseload expected to be subject to the program (i.e., those work registrants not deferred, and those who do not live in geographically excluded areas) using the format presented in Table 2.

Table 2
Estimated E&T Participant levels and
Characteristics

Number of E&T Program Participants				
MANDATORY		VOLUNTARY		TOTAL
Applicant	Recipient	Applicant	Recipient	

PART 3: PROGRAM COORDINATION

Part 3 of the County Plan should describe two types of coordination: intra-agency (within the Food Stamp Program), and inter-agency (between the F&T program and other agencies and programs).

3.1 Intra-agency Coordination

The Plan should clearly describe in Sections 3.1.1, 3.1.2, and 3.1.3 how the F&T program relates to other processes in the Food Stamp Program.

3.1.1 **Narrative Coordination Statement.** The link between the following food stamp functions and the F&T program should be described:

- o intake and application
- o certification
- o recertification
- o work registration
- o screening for F&T participation requirement
- o F&T registration
- o sanctioning resulting from noncompliance with the F&T program

This narrative statement could include a sample organization chart and sample client flow chart.

3.1.1.1. **Information Coordination.** This section of the plan should briefly describe how information will be coordinated and exchanged (forms, computer linkages, documentation of participant status and actions taken).

It is particularly important to describe the procedures established to assure that appropriate sanction actions are taken within ten working days after learning of an individual's noncompliance with F&T requirements.

3.1.1.2 **Coordination Timeframes.** Any planned timeframes associated with the F&T program and the major Food Stamp Program functions should be described (e.g., how much time elapses between application for food stamps and referral into the F&T program; between initiating a Notice of Adverse Action and actual imposition of Sanctions).

3.2 Inter-agency Coordination

An important aspect of the F&T program is that it should coordinate as closely as possible with other relevant programs and agencies to maximize the use of all resources to assist food stamp applicants and recipients to improve their employability and self-sufficiency.

This section of the County Plan should describe any proposed linkages between the F&T program and other programs such as JTPA, GA Employment Program, using the format presented in Table 3, and summarized here:

3.2.1 Areas of Coordination

- o Another agency delivers services in an F&T component.
- o The F&T program and another program or agency jointly operate one or more components (e.g., integrated Job Search Workshops).
- o The F&T program refers individuals to another agency or program for services.
- o Other areas of coordination should be specified as appropriate in the County

3.2.2 Coordinating Agencies or Programs

- o JTPA
- o GAIN
- o General Assistance Work Program
- o Other agencies or programs should be specified as appropriate in the County

3.2.3 Methods of Coordination

- o Non-financial inter-agency agreements
- o Contract for provision of services
- o Joint Plans of Operations
- o Coordinated local service delivery areas
- o Informal referral procedures
- o Other methods of coordination should be specified as appropriate in the County

Table 3
Summary of
Coordination for the E&T Program

<u>Areas of Coordination</u>	<u>Agencies/Programs</u>	<u>Method of Coordination</u>
1. Delivering an E&T Component		
2. Joint component by the E&T program and another agency or program		
3. Referral of individuals from the E&T program to other programs or agencies		
4. Other (Specify)		

PART 4:

PROGRAM COSTS AND FINANCIAL MANAGEMENT

Part 4 of the County Plan must address the costs of the F&T program and related financial issues.

4.1 Planned Costs of the County F&T Program

The information provided in the following sub-sections of the Plan must indicate how the federal F&T funds are being used, and identify any use of State or County funds. Any costs charged must be reasonable, necessary, and properly allocated to the F&T program. If the CWD wants to provide services that cost more than the allocation, justification must be provided.

4.1.2 **Component Costs.** This subsection shall include an estimate of the anticipated costs of each work or employment and training program component included in the County F&T program.

4.1.3 **Justification of Costs.** Counties which plan to use Federal F&T funds for any education component or to request 50 percent Federal reimbursement for costs above the unmatched Federal grant must include a statement in subsection 4.1.3.1 explaining why such charges are appropriate.

4.1.3.1 **Justification of Costs Exceeding the F&T Grant.** Counties requesting reimbursements in excess of the unmatched Federal Grant (other than for participant reimbursements) must explain the need for these funds (e.g., the breadth of services, the intensity of services, and the costs of the services). Costs in excess of the F&T Grant can be allowed only with the prior approval of FNS and must be adequately documented to ensure that they are necessary, reasonable, and properly allocated.

4.2 Contractual Arrangements

If the County anticipates contracting out any portions of the F&T program, this section of the County Plan should describe those contractual arrangements and briefly summarize the contract management approach that will be followed (e.g., performance contracting, method of contract monitoring, auditing procedures, competitive procurement). FNS regulations require that copies of all contracts for F&T services be available for inspection at the County offices.

4.3 Participant Reimbursement

The CWD is responsible for reimbursing participants for expenses incurred in relation to F&T activities. Any information on how many individuals are expected to need reimbursement and the amount of money individuals may need should be included here.

Table 4
Planned Costs

	<u>Component Costs</u> <u>for 10/1/87-6/30/88</u>	<u>Federal</u>	<u>State</u>	<u>County</u>	<u>TOTAL</u>
Component 1	_____	_____	_____	_____	_____
Component 2	_____	_____	_____	_____	_____
Component 3	_____	_____	_____	_____	_____
1. TOTAL		_____	_____	_____	_____
Estimated County Allocation of E & T Grant Funds: _____ (100% Federal Allocation)					
2. Additional E & T Costs:		_____	_____	_____	_____
3. Participant Reimbursement:					
Up to \$25 per month		_____	_____	_____	_____
Total E & T Program Cost: _____					
Add lines 1 & 3					
FDP Purchase & Development for period 7/1/87-9/30/87: _____					

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**PART 5:
TOTAL COUNTY GEOGRAPHIC EXCLUSION**

This part of the plan should be completed by a County that believes its entire County requires a geographic exclusion.

In order to obtain FNS approval of excluding certain geographic areas, justification regarding the impracticality of operating a program in that area must be provided by the county as an inclusion in the state plan. FNS has suggested that factors which might justify a geographic exclusion include lack of job opportunities, the remote location of job opportunities, and lack of child care facilities. Other factors which might be considered by FNS include lack of public transportation in the area, recent plant closures causing high unemployment and areas declared disaster areas. Lack of funds or conflict with GAIN are not acceptable reasons for impracticality.

If your County wants to exclude the entire County from participation, strong justification and rationale must be provided. Completion of Parts 1 through 4 of the county plan is not required if your County requests total geographic exclusion.

5.1 Work Registrant Population

Please provide us with the number of excluded work registrants for the period beginning October 1, 1987 through June 30, 1988. A summary of the characteristics of the work registrant population should also be included if available. Such characteristics include:

- o Number of work registrants for recent fiscal years
- o Demographic characteristics of work registrants (e.g., age, household status, sex, special groups such as Indians, migrant workers, refugees)
- o Program status (PAFS versus NAFS; AFDC status; GA status)

The summary should note how the data were compiled (e.g., special survey, FS Job Search Program data, analysis of the Quality Control file, CWD automated client record or certification system).

5.2 Exclusion Justification

Provide a narrative statement(s) about why your County should be excluded.

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FOOD STAMP EMPLOYMENT AND TRAINING (E & T) PROGRAM STATISTICAL REPORT (QUARTERLY)

SEND ONE ORIGINAL AND 2 COPIES TO:

DEPARTMENT OF SOCIAL SERVICES
STATISTICAL SERVICES SECTION
744 P STREET, M.S. 19-84
SACRAMENTO, CALIFORNIA 95814
(916) 924-2838

DRAFT

COUNTY:	3 MONTH	YEAR
QUARTER ENDING (FFY):	B State Use Only	

PART A. PROGRAM REGISTRANTS	(1) MONTH 1	(2) MONTH 2	(3) MONTH 3	(4) QUARTERLY TOTAL
1. Number of new work registrants	01	02	03	04
2. Number of work registrants exempted from E & T participation (Item 2, Col. 4 same as 6. b., Col. 4 below)	05	06	07	08
3. Volunteers who begin E & T component	09	10	11	12
4. E & T mandatory participants who begin E & T component (include applicant, if appropriate)	13	14	15	16
5. Work registrants sent notice of adverse action and applicants denied certification for failure to comply with E & T	17	18	19	20

PART B. EXEMPTIONS	(4) QUARTERLY TOTAL
6. Number of exemptions granted (categorical and individual) (Total of 6.a. and 6.b.)	21
a. Categorical	22
1. Geographic exemption	23
b. Individual (Total of 6.b.1 through 6.b.8)	24
1. Physical or mental problems	25
2. Lack of childcare	26
3. Lack of transportation to/or distance from E & T program site	27
4. Family difficulties	28
5. Legal difficulties	29
6. Temporarily unemployed - expected to return to work within 60 days	30
7. Non-English speaking	31
8. Other (specify)	32

PART C. COMPONENT PARTICIPANTS	(1) WORKFARE	(2) JOB SEARCH	(3) JOB CLUB	(4) QUARTERLY TOTAL
7. Number of participants placed in each component offered by county	33	34	35	36
A. E & T mandatory participants				
B. E & T voluntary participants	37	38	39	40
C. Total number of participants (mandatory & voluntary)	41	42	43	44

PART D. OCTOBER REGISTRANTS

8 Total number of work registrants during the period October 1 through October 31. (See instructions)

REPORT PREPARED BY

TELEPHONE

DATE

FOOD STAMP EMPLOYMENT AND TRAINING (E & T) PROGRAM STATISTICAL REPORT

This report shall cover county activities relating to employment and training programs during each report period, which shall be Federal fiscal quarters. Each county shall prepare an original and two copies to be submitted to SDSS by the fifteenth working day of the month following the report quarter.

General Instructions:

Items 1 through 5 — Complete these lines on every quarterly report; for each month in the quarterly total.

- Item 1 — The number of participants registered for work by eligibility workers. The participants who will not be reflected in this number are those exempted from work registration by the provisions of the Food Stamp Act of 1977, as amended. Do not count any individual as registered more than one time during the fiscal year. Do not count re-registrations during the fiscal year.
- Item 2 — The number of work registrants exempted by SDSS from placement in an employment and training program for reasons approved by SDSS.
- Item 3 — The number of food stamp recipients, whether they are work registered, or exempted from placement in an employment and training program, who volunteer to be placed in a component, and are placed in the component.
- Item 4 — The number of persons who after a screening and assignment actually report to the employment and training component to which they were assigned. If the county operates a job component which begins at the time of Food Stamp Program application, please include these applicants.
- Item 5 — Include all notices of adverse action related to failure to comply with employment and training requirements in this category. Denials of recertification because of E & T noncompliance should also be counted. If county has job components for applicants, include denials of certification for noncompliance with employment and training requirements.
- Item 6 — All items listed should be the same throughout the fiscal year, unless amended by SDSS. In 6a, list categories of exemptions, approved by SDSS and the number of work registrants that were exempted during each quarter in column (4). In 6b, include the number of individuals exempted for personal reasons, by reason. Total exemptions granted in boxes 22 and 24 for the quarter, as well as all exemptions in Box 21.
- Item 7 — List each E & T component offered by the county and include the total number of Food Stamp Program participants who commenced the component during each quarter. If the county has a program for applicants also include these applicants. Components listed should be the same throughout the fiscal year unless amended.
- Item 8 — List the total number of work registrants (all current registrants plus all new registrants) in the county during the month of October only (October 1 through October 31). This data should be submitted in the 1st quarter report only. (October/December Quarterly.)

STAT 40 EDIT INSTRUCTIONS

PART A. PROGRAM REGISTRANTS

- 1. Item 1, Column 4 = Item 1, Cols. 1 + 2 + 3.
- 2. Item 2, Column 4 = Item 2, Cols. 1 + 2 + 3.
- 3. Item 3, Column 4 = Item 3, Cols. 1 + 2 + 3.
- 4. Item 4, Column 4 = Item 4, Cols. 1 + 2 + 3.
- 5. Item 5, Column 4 = Item 5, Cols. 1 + 2 + 3.

PART B. EXEMPTIONS

- 6. 6a + 6b = Item 6, Column 4.
- 7. 6b.1 through 6b.8 = 6b, Column 4.

PART C. COMPONENT PARTICIPANTS

- 8. Item 7a, Columns 1 + 2 + 3 = Column 4.
- 9. Item 7b, Columns 1 + 2 + 3 = Column 4.
- 10. Item 7c, Column 1 = 7a + 7b Column 1.
- 11. Item 7c, Column 2 = 7a + 7b Column 2.
- 12. Item 7c, Column 3 = 7a + 7b Column 3.
- 13. Item 7c, Column 4 = 7a + 7b Column 4.

PART C. OCTOBER REGISTRANTS

- 14. Data in Item 8 should be reported only for the month of October every year, and reported in the first quarter (FFY). (Please see instructions)

Attachment II

COUNTY ALLOCATIONS

The following is an estimate of counties FS E&T allocation for the period of October 1, 1987 through June 30, 1988. The allocation amount is subject to change with counties opting to be exempted from the program. Their portion of the allocation will be distributed to participating counties.

Counties

Alameda.....	\$163,200	Orange.....	\$85,000
Alpine.....	300	Placer.....	16,320
Amador.....	2,380	Plumas.....	2,380
Butte.....	31,960	Riverside.....	78,200
Calaveras.....	5,780	Sacramento.....	142,800
Colusa.....	5,440	San Benito.....	8,160
Contra Costa....	54,400	San Bernardino..	139,400
Del Norte.....	9,180	San Diego.....	214,200
El Dorado.....	11,560	San Francisco...	108,800
Fresno.....	204,000	San Joaquin.....	108,800
Glenn.....	6,460	San Luis Obispo.	14,960
Humboldt.....	25,500	San Mateo.....	20,060
Imperial.....	37,400	Santa Barbara...	31,280
Inyo.....	3,400	Santa Clara.....	108,800
Kern.....	132,600	Santa Cruz.....	23,120
Kings.....	30,600	Shasta.....	34,000
Lake.....	14,280	Sierra.....	680
Lassen.....	3,400	Siskiyou.....	10,880
Los Angeles.....	969,000	Solano.....	18,700
Madera.....	25,840	Sonoma.....	30,600
Marin.....	12,920	Stanislaus.....	68,000
Mariposa.....	4,760	Sutter.....	14,280
Mendocino.....	16,660	Tehama.....	12,580
Merced.....	47,600	Trinity.....	3,400
Modoc.....	4,080	Tulare.....	102,000
Mono.....	1,020	Tuolumne.....	6,800
Monterey.....	40,800	Ventura.....	64,600
Napa.....	7,480	Yolo.....	20,060
Nevada.....	8,500	Yuba.....	21,760

Total.....\$3,391,140